

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EDMAR FINANCIAL COMPANY, LLC; IRISH
BLUE & GOLD, INC.; and XTX MARKETS
LIMITED,

Plaintiffs,

v.

CURRENEX, INC.; GOLDMAN SACHS & CO.
LLC; HC TECHNOLOGIES, LLC; STATE
STREET BANK AND TRUST COMPANY;
STATE STREET GLOBAL MARKETS
INTERNATIONAL LIMITED; and JOHN DOE
DEFENDANTS 1-5,

Defendants.

Case No. 1:21-CV-06598 (LAK)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated March 18, 2022, and the Declaration of Gregg L. Weiner dated March 18, 2022 and the attached exhibits, Defendants Currenex, Inc., Goldman Sachs & Co. LLC, HC Technologies, LLC, State Street Bank and Trust Company, and State Street Global Markets International Limited will move this Court, before the Honorable Lewis A. Kaplan, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, at such date and time as the Court determines, for an order dismissing with prejudice the amended complaint filed against them in the above-captioned action by Plaintiffs Edmar Financial Company, LLC, Irish Blue & Gold, Inc., and XTX Markets Limited pursuant to Federal Rule of Civil Procedure 12(b)(6), and granting such other and further relief as the Court deems appropriate.¹

¹ State Street Global Markets International Limited objects to this Court's exercise of personal jurisdiction over it, as addressed in the Memorandum Of Defendants Currenex, Inc. And State Street Global Markets International Limited In Support Of Their Joint Motion To Dismiss Based On *Forum Non Conveniens* And Lack Of Personal Jurisdiction, filed herewith.

Dated: March 18, 2022

Respectfully submitted,

ROPES & GRAY LLP

/s/ Gregg L. Weiner

Gregg L. Weiner
Alexander B. Simkin
1211 Avenue of the Americas
New York, New York 10036
Telephone: (212) 596-5000
Facsimile: (212) 596-9090
Email: gregg.weiner@ropesgray.com
Email: alexander.simkin@ropesgray.com

ROPES & GRAY LLP

Robert G. Jones (*pro hac vice*)
800 Boylston Street
Boston, Massachusetts 02199
Telephone: (617) 951-7000
Facsimile: (617) 951-7050
Email: robert.jones@ropesgray.com

ROPES & GRAY LLP

Samer Musallam (*pro hac vice*)
2099 Pennsylvania Avenue NW
Washington, DC 20006
Telephone: (202) 508-4600
Facsimile: (202) 508-4650
Email: samer.musallam@ropesgray.com

*Counsel for Defendants Currenex, Inc., State
Street Bank and Trust Company, and State
Street Global Markets International Limited*

KATTEN MUCHIN ROSENMAN LLP

/s/ Peter G. Wilson

Peter G. Wilson
Christian T. Kemnitz (*pro hac vice*)
Elliott M. Bacon (*pro hac vice*)
Hannah O. Koesterer (*pro hac vice*)
525 W Monroe Street
Chicago, IL 60661
Telephone: (312) 902-5200
Email: peter.wilson@katten.com
Email: christian.kemnitz@katten.com
Email: elliot.bacon@katten.com
Email: hannah.koesterer@katten.com

Counsel for Defendant HC Technologies, LLC

CLEARY GOTTlieb STEEN & HAMILTON
LLP

/s/ Carmine D. Boccuzzi Jr.

Carmine D. Boccuzzi Jr.
Rishi N. Zutshi
One Liberty Plaza, 1 Liberty Plaza
New York, NY 10006
Telephone: (212) 225-2000
Email: cboccuzzi@cgsh.com
Email: rzutshi@cgsh.com

Counsel for Defendant Goldman Sachs & Co. LLC